

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

In re  
Paula Karahalis  
Debtor

Chapter 13  
Case No. 15-13266

**DEBTOR'S MOTION TO EMPLOY ATTORNEY**

Now comes Paula Karahalis, debtor in the above-referenced Chapter 13 proceeding, who, pursuant to 11 U.S.C. § 327(a), Fed. R. Bankr. P. 2014, and MLBR 2014-1, hereby respectfully moves the Court for entry of an order authorizing the employment of The Law Office of Scott Masse with regard to representation in a personal injury action that has been filed in Essex Superior Court and remains pending. In support, Ms. Karahalis states the following:

1. Debtor filed a petition for relief under Chapter 13 of the U.S. Bankruptcy Code on August 19, 2015.
2. Debtor's Schedule B identified a potential claim arising from a car accident in 2014. (ECF No. 32). Debtor previously retained The Law Office of Scott Masse to represent her in this matter.
3. Debtor, though counsel, filed a lawsuit upon this cause of action in the Essex Superior Court in 2017, which is still pending. However, Debtor inadvertently failed to obtain authorization for the employment of her attorney for this purpose. Accordingly, Debtor respectfully requests that this employment now be approved, to be effective as of the first date services were rendered.
4. Attorney Masse has agreed to represent Ms. Karahalis in this matter in exchange for a contingency fee of 33.33% of all monies recovered, plus out of pocket expenses incurred by the firm.

5. Attorney Masse has been licensed to practice law since 1988 and is well-experienced in the field of personal injury claims such as those Ms. Karahalís alleges. Attached hereto is an Affidavit from Attorney Masse, as required by MLBR 2014-1.

6. Ms. Karahalís respectfully requests that this Honorable Court approve her attorney's employment for this matter, to be effective as of the first date services were rendered.

WHEREFORE, Ms. Karahalís respectfully requests that this Honorable Court approve her attorney's employment for this matter, to be effective as of the first date services were rendered.

/s/ Christopher M. Brine  
Christopher M. Brine (BBO 679289)  
Brine Consumer Law  
100 Grove Street, Suite 116  
Worcester, MA 01605  
T (508) 556-1899 / F (508) 556-9951  
cmb@brineconsumerlaw.com

#### **Certificate of Service**

I hereby certify that on November 16, 2020 copy of the foregoing document was electronically served upon all registered CM/ECF participants in accordance with MLBR, Appendix 8, Rule 9.

/s/ Christopher M. Brine  
Christopher M. Brine (BBO 679289)

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**AFFIDAVIT OF SCOTT MASSE, ESQ.**

- I, Scott Masse, hereby submit the following affidavit pursuant to Fed. R. Bankr. P. 2014(a) and MLBR 2014-1. I state the following:
1. I am a licensed attorney with the Commonwealth of Massachusetts.
  2. This affidavit is submitted as part of an application to approve my law firm as Ms. Karahalidis' attorney with respect to her pre-petition claim for personal injury resulting from an automobile accident. I am familiar with this field of law and am familiar with the circumstances surrounding Ms. Karahalidis' claim(s).
  3. Neither I nor any member of my firm holds or represents any interest adverse to the estate of the above-named debtor.
  4. My and my firm's connections with the debtor, any creditor, or other party in interest, their respective attorneys and accountants are as follows: (None). I am, and each member of my firm is, a "disinterested person" as that term is defined in 11 U.S.C. § 101(14).
  5. I have not agreed to share with any person (except members of my firm) the compensation to be paid for the services rendered in this case, except as follows: (None).
  6. I have received a retainer in this case in the amount of \$0.00, which sum, upon information and belief, was generated by the debtor from: (N/A).
  7. I shall amend this statement immediately upon learning that: (a) any of the within representations are incorrect or (b) there is any change of circumstance relating thereto.

8. I have reviewed the provisions of MLBR 2016-1.

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE  
AND CORECT.

Dated:

10-28-2020

A handwritten signature in black ink, appearing to read 'Scott Masse', is written over a horizontal line.

Scott Masse